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March 31, 1999

Food and Drug Administration  
Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
200 C Street, SW  
Washington, DC 20204



Dear Sirs:

Notice is hereby given pursuant to the requirements of Section 403(r)(6) (21 U.S.C. § 343(r)(6)) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR § 101.93, that Rexall Sundown, Inc. located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown Herbals brand name bearing the following statement(s) on the label and/or in the labeling:

Ginkgo Biloba Complex: For mental alertness. Ginkgo Biloba promotes healthy brain function, memory and mental alertness by increasing blood circulation to the brain. It also provides antioxidant protection against cellular damage to enhance health. To further promote healthy brain function and memory, take this product with Sundown Memory Care™ and Sundown CoQ-10. Memory Care contains phosphatidylserine (PS), a nutrient that is essential to the functioning of all cells in the body, particularly in the brain where it is most concentrated. CoQ-10 works as a powerful antioxidant to help protect cellular membranes from free radical damage.

The undersigned certifies that the information contained in this notice is complete and accurate and that Rexall Sundown, Inc. has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

Deborah Shur Trinker  
Vice President of Regulatory Affairs  
and Assistant General Counsel

Enclosure

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